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9 UNITED STATES BANKRUPTCY COURT

10 FOR THE DISTRICT OF OREGON

11 In re
12 SeaPort Airlines, Inc.
13 Debtor.

14 Case No. 16-30406-tmb11
LIMITED OBJECTION TO DEBTOR'S
APPLICATION FOR AUTHORITY TO
EMPLOY PROFESSIONAL Special Counsel
- Barran Liebman LLP (Nelson D. Atkin, II)

15 The Official Committee of Unsecured Creditors (the "Committee") for its limited
16 objection to the Application for Authority to Employ Professional, Special Counsel - Barran
17 Liebman LLP (Nelson D. Atkin, II) (the "Application") (ECF No. 216) filed by SeaPort Airlines,
18 Inc. ("SeaPort" or the "Debtor") states as follows:

19 **LIMITED OBJECTION**

20 1. The Debtor seeks to employ Barran Liebman LLP to serve as special counsel to
21 advise the Debtor on employment issues, including the possible defense of an OSHA complaint
22 filed by Robert McKinney, the Debtor's former president.

23 2. The Committee understands and appreciates the complex nature of the industry in
24 which the Debtor operates. The Committee does not seek to substitute its judgment for that of
25 the Debtor on the topic of retention of professionals. Nor does the Committee question the
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1 qualifications of the Barran Liebman firm to handle the employment matter identified by the
2 Debtor or the rates proposed to be charged.
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4 3. The Committee has two essential concerns. First, it appears that the McKinney
5 complaint was filed in violation of the automatic stay. Prior to the retention of special counsel to
6 appear and defend on the merits, the Committee urges the Debtor to consider raising the
7 automatic stay in an attempt to have the complaint either dismissed or transferred to this Court.

8 4. Second, the Committee notes that in this relatively small case, the Debtor has
9 retained or is seeking to retain eight separate sets of professionals, not including counsel to the
10 Committee. Counsel for the Committee has discussed the need for each professional as the
11 applications have been filed. While legitimate needs have been articulated by the Debtor, the
12 Committee is concerned about the administrative burden such a large fleet of professionals
13 potentially places on this case and, in particular, on the Debtor's ability to successfully
14 restructure while making meaningful payments to its creditors.

15 5. Prior to the approval of any further estate professionals, the Committee requests
16 that the Court require the Debtor to fully report on the administrative expenses incurred to date
17 by the estate's professionals and provide budgeted amounts for each.
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6. In light of the rapidly approaching termination of exclusivity, the Committee is anxious to engage in discussions with the Debtor regarding the outline of a plan of reorganization.

Respectfully submitted,

DATED: April 15, 2016

PERKINS COIE LLP

By: /s/ Douglas R. Pahl
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Counsel to Official Committee of Unsecured Creditors.

CERTIFICATE OF SERVICE

The undersigned hereby certifies that on the date shown below the foregoing **LIMITED**

OBJECTION TO DEBTOR'S APPLICATION FOR AUTHORITY TO EMPLOY

PROFESSIONAL Special Counsel - Barran Liebman LLP (Nelson D. Atkin, II) was electronically filed with the Clerk of Court using the CM/ECF system, which will send a Notice of Electronic Filing to all CM/ECF participants, which includes Debtor's counsel, the United States Trustee's office and parties requesting notice electronically, and a copy of the pleading will be sent via U.S. Mail on the date shown below to the following parties:

Franklin C. Adams POB 1028 Riverside, CA 92502-1028 <i>Creditor San Diego County Regional Airport Authority</i>	Michael J. Edelman 1633 Broadway 47th Floor New York, NY 10019 <i>Creditor Aircraft Lease Finance III</i>
Tulare County Tax Collector Attn Jorge Garcia Deputy Tax Collector 221 S Mooney Blvd Rm 104-E Visalia, CA 93291-4593	Mark J. Wolfson 100 N Tampa St #2700 Tampa, FL 33602 <i>Interested Party Airlines Reporting Corp.</i>

DATED this 15th of April, 2016

PERKINS COIE LLP

/s/ Douglas R. Pahl

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Counsel to Official Committee of Unsecured Creditors

PAGE 1- CERTIFICATE OF SERVICE

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